

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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UNITED STATES OF AMERICA,  
Plaintiff,

v.

JEREMY JONATHAN FROIAS.  
Defendant.

**INDICTMENT**

CRIMINAL NO. 23- 190 (FAB)

**VIOLATIONS:**

18 U.S.C. § 1801

18 U.S.C. § 2252A(a)(5)(B)

**TWO COUNTS &  
FORFEITURE ALLEGATION**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**Video Voyeurism**

(Title 18, United States Code, Section 1801)

From in or about April 30, 2023, through in or about May 1, 2023, in the special maritime and territorial jurisdiction of the United States, and within the jurisdiction of this Court, the defendant,

**JEREMY JONATHAN FROIAS,**

did knowingly capture images of the private area of individuals without their consent, under circumstances in which the individuals have a reasonable expectation of privacy while onboard a cruise ship by means including a camera with Wi-Fi capabilities and a mobile device. All in violation of 18 U.S.C. § 1801.

**COUNT TWO**

**Attempted Possession of Child Exploitation Material**

(Title 18, United States Code, Section 2252A(a)(5)(B))

From in or about April 30, 2023, through in or about May 1, 2023, in the special maritime and territorial jurisdiction of the United States, and within the jurisdiction of this Court, the defendant,

**JEREMY JONATHAN FROIAS,**

knowingly attempted to possess, and knowingly attempted to access with intent to view, any material containing an image of child pornography as defined by Title 18, United States Code,

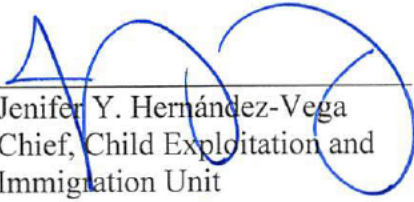
Section 2256(8)(A) by any means, including by mobile device, that is: the defendant, using electronic devices, such as, a camera and an Apple iPhone Pro Max 14, both of which have internet capabilities, attempted to possess images of child pornography, including child pornography of a prepubescent minor or a minor who had not attained 12 years of age. All in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(1).


**FORFEITURE ALLEGATION**

The allegations of this Indictment are re-alleged as if fully set forth herein, for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

If convicted of the offense set forth above, **JEREMY JONATHAN FROIAS**, the defendant herein, shall forfeit to the United States, any and all materials or property used or intended to be used in the possession, receipt, transportation and distribution of child pornography, including but not limited to: an iPhone Pro Max 14 cellular phone device and a Wi-Fi camera. All pursuant to Title 18, United States Code, Section 2253.

W. STEPHEN MULDROW  
United States Attorney

  
Jenifer Y. Hernández-Vega  
Chief, Child Exploitation and  
Immigration Unit

  
Emelina M. Agrait-Barreto  
Assistant United States Attorney  
Child Exploitation and Immigration Unit

TRUE BILL,

Foreperson:

Date: 5/10/23